

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

IBRAHEM WAHBA

Plaintiff

V.

THE GENERATION COMPANIES, LLC

Defendant

1:20-cv-48

## COMPLAINT

### Jurisdictional Statement

This Court has jurisdiction of this matter pursuant to The Fair Labor Standards Act, 29 U.S.C.A. §201 et seq (hereinafter sometimes FLSA).

The plaintiff is a citizen of Virginia. Upon information and belief, the defendant is a North Carolina LLC authorized to do business in Virginia.

### Claim

1. Plaintiff is a former employee of defendant.
2. Plaintiff served as a manager of the Candlewood Suites motel located at 45520 Severn Way, Sterling, VA, US, 20166.
3. Plaintiff was paid on an hourly, not a salaried, basis.
4. Between 1/23/17 and 9/29/19, plaintiff worked more than 640 hours for defendant for which he should have been compensated by defendant at a rate of time and one-half of his hourly rate (overtime), but he was not so compensated. See FLSA §207.
5. Unpaid overtime in this case amounts to \$5,586.07.
6. Section 216 of the FLSA provides for liquidated damages in an additional equal amount as unpaid overtime compensation. Section 216 of the FLSA also provides for a reasonable attorney's fee to be paid by the defendant, and costs of the action.

WHEREFORE, plaintiff prays that the Court award judgment against defendant in the amount of \$5,586.07 plus liquidated damages in an additional equal amount, plus a reasonable attorney's fee and costs of the action. The plaintiff also prays for such further relief that the Court finds appropriate.

/s/

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